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9 *Attorneys for the United States of America*

10
11 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
12 SOUTHERN DIVISION

13 RELIASTAR LIFE INSURANCE CO.,)
14 Plaintiff,) Case No. 2:18-cv-01166-APG-NJK
15 v.)
16 JACLYN R. HAFTER, INDIVIDUALLY)
AND AS TRUSTEE OF THE HAFTER)
17 FAMILY TRUST DATED JUNE 11, 2011,)
BRANDON PHILLIPS, AS TRUSTEE OF)
18 THE JACOB HAFTER TRUST DATED)
APRIL 17, 2018, THE UNITED STATES OF)
19 AMERICA, ACTING THROUGH THE)
INTERNAL REVENUE SERVICE, AND)
DOES 1-5)
20)
21 Defendants.)
22 _____)

23 COMES NOW, Jaclyn Hafter, individually and as Trustee of the Hafter Family Trust,
24 dated June 12th, 2011; Brandon Phillips, as Trustee of the Jacob Hafter Trust, dated April 17,

1 2018; and United States of America, on behalf of the Internal Revenue Service, (the “Parties”)
2 by and through undersigned counsel, and hereby submit the following Stipulation and Order:

3 1. On February 11, 2019, Jaclyn Hafter, on behalf of her minor children, G.H., J.H.,
4 A.H., and S.H. filed her Request for Order Shortening Time; and Motion to Intervene as Parent
5 of Minor Children, and Motion for Release of Funds for the Benefit of Minor Children [ECF No.
6 31](the “Motion”).

7 2. By Order, dated February 12, 2019, the Court directed that all counsel confer
8 regarding the Motion as soon as reasonably possible to determine whether an agreement could be
9 reached among the Parties [ECF No. 32].

10 3. By Stipulation dated February 13, 2019, the Parties agreed to payment of the
11 annual property taxes on the Hafter family residence and one payment to Jaclyn Hafter in the
12 amount of \$7,192. The United States requested that Jaclyn Hafter provide the government with a
13 completed financial statement before it considered a longer term disbursement agreement [ECF
14 No. 36].

16 4. By Order dated February 14, 2019 [ECF No. 37], the Court approved the
17 Stipulation and the two disbursements and set a briefing schedule for the Motion with a hearing
18 scheduled for March 26, 2019.

19 5. After further discussions between the Parties, it is stipulated that in order to
20 prevent hardship to the Hafter family while this Interpleader Action is being adjudicated, the
21 following distributions may be made:

22 (a) The Clerk of the Court shall release from the interpled funds being held in Case
23 No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on April 1, 2019;
24
25
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- (b) The Clerk of the Court shall release from the interpled funds being held in Case No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on July 1, 2019;
- (c) The Clerk of the Court shall release from the interpled funds being held in Case No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on October 1, 2019;
- (d) The United States is agreeing to these distributions based upon Jaclyn Hafter's representations regarding her financial condition; and
- (e) These distributions are intended for the benefit of the Hafter minor children and will be deducted from any portion of the interpled funds to which they are determined to be entitled by the Court.

DATED: March 14, 2019

/s/Henry C. Darmstadter
HENRY C. DARMSTADTER
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DATED: March 14, 2019

/s/Cary Colt Payne
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702-383-9010

Attorney for Defendant Brandon Phillips, as trustee of the Jacob Hafter Trust dated April 17, 2018

1
2 DATED: March 14, 2019

/s/Alexander G. LeVeque
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6
7 Attorneys for defendant Jaclyn R. Hafter

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ORDER

9 NOW THEREFORE, based upon the above stipulation between the Parties, this Court enters its
10 Orders and Decrees as follows:

11 **IT IS HEREBY ORDERED** that the Clerk of the Court shall release from the interpled
12 funds being held in Case No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on
13 April 1, 2019;

14 **IT IS HEREBY ORDERED** that the Clerk of the Court shall release from the interpled
15 funds being held in Case No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on
16 July 1, 2019; and

17 **IT IS HEREBY ORDERED** that the Clerk of the Court shall release from the interpled
18 funds being held in Case No. 2:18-cv-01166-APG-NJK the sum of \$19,104 to Jaclyn R. Hafter on
19 October 1, 2019.

20
21 **IT IS SO ORDERED:**

22
23
24 
UNITED STATES DISTRICT COURT
JUDGE
Dated: March 18, 2019.